



**GENOVA  
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April 30, 2018

**VIA ECF – ELECTRONIC FILING**

Honorable Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

**Re: CONSENT MOTION FOR EXTENSION OF TIME TO MAY 31, 2018 FOR  
ALL DEFENDANTS TO RESPOND TO COMPLAINT  
Moore et al. v. New York Concrete Corporation et al., Civil Action No. 18-  
2791**

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Dear Judge Engelmayer:

Our Firm represents defendants New Leaf Development LLC and John Russo in the above matter.

I have conferred with Thomas Kennedy, counsel for Plaintiffs, and with James Terry, counsel for New York Concrete Corporation, and all parties have consented to an extension to and including May 31, 2018 of the time for all Defendants to respond to the Complaint in this Action.

Accordingly, all parties jointly request that the Court grant all Defendants an extension to and including May 31, 2018 to respond to the Complaint.

Respectfully submitted,

**GENOVA BURNS LLC**

  
PATRICK W. MCGOVERN

PWM:BMP

c. All Counsel of Record (via ECF – Electronic Filing)